

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

AKSHAY RAM KANCHARLA,

*Defendant.*

Case No. 1:22-mj-26

**CONSENT MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER**

The United States of America, by and through Jessica D. Aber, United States Attorney, and Bibeane Metsch, Assistant United States Attorney, respectfully moves this Honorable Court for entry of the attached stipulated Protective Order, pursuant to Federal Rule of Criminal Procedure 16(d)(1) and Federal Rule of Evidence 502(d). Counsel for the defendant, Akshay Ram Kancharla, has reviewed the proposed protective order and advised that he does not oppose this Motion. In support thereof, the United States submits the following:

1. During the course of the investigation, the United States has gathered or generated voluminous documents, including electronic records, which contain confidential information and personal identifiers for the defendant and non-parties in this case. These documents and electronic records currently include and are anticipated to include, but are not limited to, law enforcement investigative reports, information from electronic devices, and other Jencks Act materials. The United States intends to produce these documents and electronic records, in accordance with the Federal Rules of Criminal Procedure, relevant case law, and any Discovery Orders that are agreed upon and entered in this case.

2. Accordingly, the proposed Protective Order regulates discovery in this case by

restricting the use and dissemination of documents and electronic records obtained through discovery. In sum, the proposed Protective Order prohibits the dissemination of these documents and electronic records and the information contained therein to third parties, other than as necessary for the defendant's investigations of the allegations and preparation of their defenses.

3. The defendant and his counsel have reviewed this Motion and the proposed Protective Order, and have agreed to its terms.

WHEREFORE, the undersigned respectfully requests that the Court enter the proposed Protective Order.

Respectfully Submitted,

Jessica D. Aber  
United States Attorney

By: /s/  
Bibeane Metsch  
Assistant United States Attorneys  
United States Attorney's Office  
2100 Jamieson Avenue  
Alexandria, VA 22314  
Phone: (703) 299-3700  
Fax: (703) 299-3980  
Email: bibeane.metsch@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of March 2022, I electronically filed the foregoing using the CM/ECF system, which will automatically send a notification of such filing to all counsel of record.

/s/

Bibeane Metsch  
Assistant United States Attorney  
United States Attorney's Office  
2100 Jamieson Avenue  
Alexandria, Virginia 22314  
Phone: 703-299-3700  
Fax: 703-299-3982  
Email: bibeane.metsch@usdoj.gov